SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Blvd., South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

DANIEL G. BOGDEN
United States Attorney
District of Nevada
SUSAN CUSHMAN
Assistant United States Attorney
501 Las Vegas Blvd., Suite 1100
Las Vegas, Nevada 89101
Telephone: (702) 388-6336
Susan.cushman@usdoj.gov

FILED
2016 FEB - 1 AM 11: 08
U.S. MAGISTRATE JUDGE
BY__________

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
-oOo-

UNITED STATES OF AMERICA,

Plaintiff

vs.

JACK W. MORGAN, and
SAMUEL BROWN,

Defendants.

Case No.: 2:17-mj-00093-VCF

CRIMINAL COMPLAINT

Violation:
18 U.S.C. § 1201(a)(1)(c), – Kidnapping
18 U.S.C.§ 2 – Aiding and Abetting

BEFORE a United States Magistrate Judge of the United States District Court for the District of Nevada, the undersigned Complainant, being duly sworn, deposes and states:

COUNT 1: – KIDNAPPING

On or about January 30, 2017 at approximately 10:36 a.m., in the state and federal District of Nevada and within the jurisdiction of this Court, **JACK W. MORGAN and SAMUEL BROWN**, the defendants herein, aiding and abetting one another, kidnapped and transported victim in interstate commerce all in violation of 18 U.S.C. §§ 1201(a)(1)(c), and 2.

PROBABLE CAUSE AFFIDAVIT

FILED
2016 FEB -1 AM 11:08
U.S. MAGISTRATE JUDGE
BY_____

Complainant, Brian T. Wainscott, as a Special Agent with the Federal Bureau of Investigation (FBI), states the following as and for probable cause:

1. Complainant is a Special Agent with the Federal Bureau of Investigation (FBI), and has been so employed since August 2016. Currently, Complainant is assigned to the Las Vegas Field Office's Safe Streets Gang Task Force (hereafter, "SSGTF") and is responsible for investigating violent crimes including but not limited to cases involving drug trafficking, kidnapping, extortion, robbery, felons in possession of firearms, as well as investigations into the activities and operations of criminal enterprises. Your Complainant has experience in conducting criminal investigations, including the investigation of criminal groups and conspiracies, as well as the collection of evidence and the identification and use of witnesses.

2. The information used to support this Complaint was derived from first hand observations made by law enforcement personnel and Las Vegas Metropolitan Police Department (hereafter, "LVMPD") reports. This Complaint contains information necessary to support probable cause to believe that the criminal offense described herein was committed by the defendants, **JACK W. MORGAN and SAMUEL BROWN,** and is not intended to include each and every fact and matter observed by your Complainant or known to the Government. Moreover, to the extent that this Complaint contains statements by witnesses, those statements are set forth only in part and in substance and are intended to accurately convey the information, but not to be verbatim recitations.

FACTS ESTABLISHING PROBABLE CAUSE

3. On January 30, 2017 at approximately 10:36 a.m., police officers of the LVMPD responded to 4201 S. Dectaur bldg #26 Unit 3087, Las Vegas, Nevada, 89103 for a kidnapping call for service. Upon arrival responding officers spoke with witness #1. Witness #1 observed the victim being dragged out of her residence by a subject later identified as MORGAN. Witness #1 described

the female as wearing only female undergarments, being bound and gagged by handcuffs on her wrists, chains securing her legs together and a white material that was stuffed into her mouth. Witness #1 said that MORGAN had his arm around the victim's neck and believed MORGAN to be choking the victim as he dragged her down the apartment steps from the third floor to ground level. MORGAN then placed the victim into a Chevy white van, with Texas license plates and the first two letter starting with 'CT' or 'CJ' that was parked in a handicapped parking spot through a sliding door on the driver side.

4. Responding officers noticed a green sweater on the walkway leading towards the victim's apartment and approximately 15 feet away, on the same walkway and closer to the apartment, was a purple sock. Officers noticed a plastic rubbish container in front of the landing that leads to four apartment front doors. Officers checked the door which was closed, but unlocked with no evidence of forced entry. Upon entry, officers noticed an electronic touch stun device along with a knife was laying on the floor on the inside of the apartment close to the front door. During the search, officers found no-one inside however officers could see signs indicative of a struggle. Next to the bed, a lighting stand was knocked over with fresh indentations into the drywall. There was a purse inside the apartment containing the victim's identification. The manangement at the apartment complex confirmed the apartment was lessed to the victim.

5. LVMPD detectives made contact with the victim's emergency contact listed on file with the apartment complex (hereinafter witness #2). Witness #2 told LVMPD detectives Frank MORGAN was a past boyfriend of victim and fit the description given by witness #1. The victim's father provided a cellular number of 281-772-1774 for Frank MORGAN. LVMPD did a systems check of 281-772-1774 showing the number returned to Jack MORGAN, dob 05/24/1985. A photo of MORGAN was shown to the victim's father who confirmed Frank MORGAN was the same as Jack MORGAN. A photo of MORGAN was shown to witness #1 who believed it was the same person who forced the victim from her residence.

6. Information was obtained showing the location of MORGAN was just outside Sante Fe, New Mexico. LVMPD detectives coordinated with New Mexico State Police (hereafter, "NMSP") and Espanolas police department to conduct a traffic stop on the white Chevy van with Texas license plates. A stop was conducted on a white Chevy van with Texas plate CY4C362 in Espanolas, NM. The driver of the van was MORGAN and front passenger was BROWN. Stopping officers located the victim handcuffed and chained in the back of the Chevy van. The victim was still clothed only in undergarments.

7. NMSP Investigations Bureau conducted an interview with the victim. From the interview NMSP learned that when MORGAN attacked her, he used a full roll of duct tape which he wrapped around her neck several times, across her face and on her hair. MORGAN attempted to hog tie her but was unable to since she was resisting. The victim was also tied with a chain around her neck to the wheel well of the vehicle. The victim described that during the struggle with MORGAN he choked her approximately six times rendering her unconscious, and left abrasions/cuts/scrapes on her body to include her arms, legs, neck, and face. The victim also described MORGAN was physically on top of her attempting to hog tie her. While this was happening the victim bit MORGAN on his finger and was kicking and flailing her legs and arms. The victim said MORGAN was communicating with her approximately a week prior as well as a day prior to the abduction via cell phone text messages and social media. The victim met with MORGAN a week prior for coffee after he messaged her. BROWN told the victim while enroute from Las Vegas to New Mexico that they had created fake social media accounts to track, follow and stalk her. BROWN told the victim that he followed her home after the coffee visit to learn which apartment she was living in and when MORGAN and BROWN could not locate the exact apartment number BROWN pretended to be collecting donations for a church to find the right room. NMSP detectives conducted an interview with BROWN. BROWN coborated the victms statement and addiontally told detectives that he and MORGAN had been planning the victim's abduction for approximately a year and three (3) months prior to the actual abuduction. BROWN told NMSP detectives that he attempted to contact the victim over social media in an attempt to lure the victim

to MORGAN. The victim didn't respond to the contacts. BROWN then took a donation crate from a local church near the victim's apartment complex. BROWN used the donation crate as a ploy to go door to door asking for church donations throughout the complex attempting to locate the victim's apartment for MORGAN. Through this ploy BROWN located the victim at her apartment and notified MORGAN of his findings.

8. Based on your Complainant's training and experience, he has a reasonable belief that the defendants aiding and abetting one another kidnapped the victim in Las Vegas, Nevada and transported the victim to New Mexico.

9. Based on my training an experience there is probable cause to believe that the defendants violated 18 U.S.C. §§ 1201(a) and 2.

Special Agent Brian Wainscott
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me
this 1st day of February, 2017.

UNITED STATES MAGISTRATE JUDGE